

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CIRBA INC. D/B/A DENSIFY
and CIRBA IP, INC.,

Plaintiffs/Counter-Defendants,

v.

VMWARE, INC.,

Defendant/Counter-Plaintiff.

Civil Action No. 1:19-cv-00742-LPS

(Consolidated)

JURY TRIAL DEMANDED

DENSIFY’S MOTION FOR DISQUALIFICATION OF SPECIAL MASTER

Pursuant to the Court’s Order Appointing Special Master (D.I. 1040), Cirba Inc. (d/b/a Densify) and Cirba IP, Inc. (collectively, “Densify”) file this Motion for Disqualification of Special Master, and move the Court, pursuant to 28 U.S.C. §§ 455, for an order disqualifying John W. Shaw from serving as Special Master in the above-captioned case. A proposed order is attached hereto.

The grounds for this motion are set forth in Densify’s letter brief in support of its motion for disqualification and the exhibits thereto, which were submitted to the Special Master on September 7, 2021.

Dated: September 24, 2021

Respectfully submitted,

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